

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST LITIGATION

Case No. 18-cv-1776 (JRT/HB)

This Document Relates To: All Actions

**NOTICE OF *IN CAMERA* SUBMISSION BY DIRECT PURCHASER
PLAINTIFFS OF THE CONFIDENTIAL AGREEMENT REGARDING THE
OPT-OUT REDUCTION THRESHOLD FOR SMITHFIELD SETTLEMENT**

In accordance with the Court’s request during the January 27, 2022 final approval hearing for the settlement between the Direct Purchaser Plaintiffs (“DPPs”) and defendant Smithfield Foods, Inc. (“Smithfield”), the DPPs hereby give notice that the Confidential Agreement regarding the percentage of opt-out commerce that would trigger application of the settlement reduction formula referenced in Paragraph 20 of the parties’ class action settlement agreement (ECF No. 831-2, at p. 19) is being submitted for *in camera* review by the Court.

DATED: January 27, 2022.

/s/ Bobby Pouya

Bobby Pouya
Clifford H. Pearson
Daniel L. Warshaw
Michael H. Pearson
PEARSON SIMON & WARSHAW, LLP
15165 Ventura Boulevard, Suite 400
Sherman Oaks, CA 91403
T: (818) 788-8300
cpearson@pswlaw.com
dwarshaw@pswlaw.com
bpouya@pswlaw.com
mpearson@pswlaw.com

Melissa S. Weiner (MN #0387900)
PEARSON, SIMON & WARSHAW, LLP
800 LaSalle Avenue, Suite 2150
Minneapolis, MN 55402
T: (612) 389-0600
mweiner@pswlaw.com

Bruce L. Simon
Benjamin E. Shiftan
Neil Swartzberg
PEARSON, SIMON & WARSHAW, LLP
350 Sansome Street, Suite 680
San Francisco, CA 94104
T: (415) 433-9000
F: (415) 433-9008
bsimon@pswlaw.com
bshiftan@pswlaw.com
nswartzberg@pswlaw.com

/s/ Joseph C. Bourne

Joseph C. Bourne (MN #0389922)
W. Joseph Bruckner (MN #0147758)
Brian D. Clark (MN #0390069)
Arielle S. Wagner (MN #0398332)
Craig S. Davis (MN #0148192)
Simeon A. Morbey (MN #0391338)
Stephen M. Owen (MN # 0399370)
LOCKRIDGE GRINDAL NAUEN P.L.L.P.
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
T: (612) 339-6900
jcbourne@locklaw.com
wjbruckner@locklaw.com
bdclark@locklaw.com
aswagner@locklaw.com
csdavis@locklaw.com
samorbey@locklaw.com
smowen@locklaw.com

***Co-Lead Class Counsel for Direct Purchaser
Plaintiffs***